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Attorneys for Defendant/Respondent,
City of Torrance

[See Next Page for Additional Counsel]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TORRANCE AIRPORT)	Case No. 2:24-cv-02692-JFW (MBKx)
ASSOCIATION, CHAPTER OF)	
CALIFORNIA PILOTS)	RESPONDENT'S RESPONSE
ASSOCIATION, a California Nonprofit)	REGARDING MEDIATION
Public Benefit Corporation,)	STATUS

Plaintiff/Petitioner,)	Case Assigned to:
v.)	District Court Judge: John F. Walter
)	Magistrate Judge: Michael B. Kaufman

CITY OF TORRANCE,)	
)	Petition Filed: March 8, 2024
Defendant/Respondent.)	

1 Patrick Q. Sullivan (State Bar No. 179922)
2 psullivan@torranceca.gov
3 Tatia Y. Strader (State Bar No. 198735)
4 tstrader@torranceca.gov
5 Office of the City Attorney
6 3031 Torrance Blvd.
7 Torrance, California 90503
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Attorneys for Defendant/Respondent,
City of Torrance

DECLARATION OF YANA RIDGE

I, Yana Ridge, declare as follows:

1. I am an associate attorney at Gatzke Dillon & Ballance, LLP and one of the attorneys for Respondent City of Torrance (City) in this action. I have personal knowledge of the facts set forth below, and if called as a witness, I could and would testify competently to the truth of those facts. I submit this declaration to inform the Court of the mediation/settlement conference status, pursuant to the Court's Scheduling Order (ECF 113).

2. The Court's Order (ECF 113) mandated that the parties engage in a settlement conference/mediation by June 23, 2025. The Order also required counsel to file a joint report regarding the results of the settlement conference/mediation no later than June 27, 2025.

3. The Court's Order was filed on April 21, 2025. After our office did not hear from Petitioner's counsel to coordinate on the settlement negotiations, I emailed Mr. Harshman on May 21, 2025 (over a month ago) and asked to have a phone call to "discuss the logistics and scheduling." I received no response from Mr. Harshman, and therefore, on June 2, 2025, I sent a follow-up email, in which I stated that "[s]ince the settlement completion deadline is just 3 weeks away, we would like to get TAA's opening settlement proposal by end of this week (COB Friday June 6), so that we can present it to City Council at the next closed session for consideration and response." I again suggested we have a phone call to discuss the matter. Seven days later, on June 9, 2025, I sent another email to Mr. Harshman, pointing out that in light of no response to two of my emails, it appeared to the City that his client was "not interested in moving this case forward." True and correct copies of the emails I sent to Mr. Harshman on May 21, June 2, and June 9, 2025, are attached hereto as **Exhibit 1** and incorporated herein by reference.

4. Finally, on June 9, 2025, Petitioner's Counsel responded to my emails, stating his client's concern about the private mediation and its preference for a

settlement conference before the Magistrate Judge instead of a private mediation. Mr. Harshman proposed that the parties, through counsel, make a joint request to the Court to amend its Order (ECF 113). In my response on June 10, 2025, I stated that the City would not object if Petitioner requested the amendment, but I noted the late timing of his objection to private mediation and the City's prior proposal to explore a more cost-effective settlement option — informal settlement negotiations. A true and correct copy of the email chain between Mr. Harshman and me on June 9 and 10, 2025 is attached hereto as **Exhibit 2**, and incorporated herein by reference.

5. I received a response to my June 10, 2025 email in the afternoon of June 26, 2025 – sixteen days after my last email and a day before this filing is due. In his email, Mr. Harshman indicated he would be filing a request to amend the Order. However, as of the filing of this declaration, no amendment request has been filed on behalf of Petitioner. A true and correct copy of Mr. Harshman’s email dated June 26, 2025 is attached hereto as **Exhibit 3** and incorporated herein by reference.

6. Despite our request, Petitioner's counsel never provided a written settlement proposal from Petitioner so that we could review and present it to the City Council for consideration and response. Despite this Court's Order (ECF 113) and the City's best efforts to engage with Petitioner on settlement, no settlement conference/mediation has occurred before the June 23, 2025 deadline.

My declaration was executed on June 27, 2025, at Carlsbad, California. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

By: /s/Yana Ridge
Yana Ridge

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CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served on June 27, 2025 with a copy of this document via the Court’s CM/ECF system pursuant to Local Rule 5-3.2.

/s/ Yana Ridge

EXHIBIT 1

From: [Yana Ridge](#)
To: [Christopher Harshman](#)
Cc: [Mark Dillon](#); [Sue Toms](#); [Sagrario Lopez](#)
Subject: RE: Torrance/TAA - Settlement Conference/Mediation
Date: Monday, June 9, 2025 4:40:00 PM

We are following up, again, regarding the court order directing the parties to engage in settlement discussions. There was no response to two of my emails below. It appears that your client is not interested in moving this case forward – please let us know if this assessment is not accurate.

Yana L. Ridge
760.431.9501 (ext. 109)
909.200.0761 (cell)
www.gdandb.com

G | D | B Gatzke Dillon & Ballance LLP
L A W Y E R S

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From: Yana Ridge
Sent: Monday, June 2, 2025 9:46 AM
To: Christopher Harshman <charshman@shabyandassociates.com>
Cc: Mark Dillon <mdillon@gdandb.com>; Sue Toms <stoms@gdandb.com>; Sagrario Lopez <slopez@shabyandassociates.com>
Subject: RE: Torrance/TAA - Settlement Conference/Mediation

Chris,

We haven't heard from you regarding the private settlement/mediation of this case, in response to the court order (ECF 113) and my May 21 email below. Since the settlement completion deadline is just 3 weeks away, we would like to get TAA's opening settlement proposal by end of this week (COB Friday June 6), so that we can present it to City Council at the next closed session for consideration and response. As you know, City Council is the body with authority to make binding settlement decisions for the City, and any settlement terms need to be reviewed and voted on by Council in closed session.

We look forward to receiving your client's settlement demand by end of this week. Please let us know if you would like to get on a call to discuss it.

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From: Yana Ridge

Sent: Wednesday, May 21, 2025 10:39 AM

To: Christopher Harshman <charshman@shabyandassociates.com>

Cc: Mark Dillon <mdillon@gdandb.com>; Sue Toms <stoms@gdandb.com>; Sagrario Lopez <slopez@shabyandassociates.com>

Subject: Torrance/TAA - Settlement Conference/Mediation

Counsel,

The court order (ECF 113) directs us to engage in settlement discussions (a settlement conference/mediation) before June 23. Please let us know if we can have a call to discuss the logistics and scheduling, in light of the fast-approaching deadline.

Thank you,

Yana L. Ridge
760.431.9501 (ext. 109)
909.200.0761 (cell)
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EXHIBIT 2

From: [Yana Ridge](#)
To: ["Christopher Harshman"](#)
Cc: [TorranceAirportAssociationZ11624221@shabyandassociates.filevineapp.com](#); [Mark Dillon](#)
Subject: RE: Torrance/TAA - Settlement Conference/Mediation
Date: Tuesday, June 10, 2025 11:57:00 AM

Chris,

While we will not object to the TAA's request that the court amend its order, we note that you are raising this issue now, just days before the mediation deadline, even though on May 21 we asked to have a call to discuss the settlement/mediation logistics. After no response to that May 21 email, on June 2, 2025, we proposed to start with informal settlement discussions before we bring it to a mediator/judge, which would be the most cost effective, but your client has not presented a settlement demand yet. Regardless of whether this case goes through mediation or settlement conference with a magistrate judge, it would be productive to start with a settlement demand from TAA.

Thanks,

Yana L. Ridge
760.431.9501 (ext. 109)
909.200.0761 (cell)
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From: Christopher Harshman <charshman@shabyandassociates.com>
Sent: Monday, June 9, 2025 5:51 PM
To: Yana Ridge <yridge@gdandb.com>
Cc: [TorranceAirportAssociationZ11624221@shabyandassociates.filevineapp.com](#)
Subject: Re: Torrance/TAA - Settlement Conference/Mediation

Yana,

My apologies, I was out of the office most of last week and am just now seeing this. If you send an email and do not get a timely reply kindly **call my office** and leave a message with my assistant.

We are of course interested in resolving this matter. I note however that our Joint Rule 26 Report specified: "The parties have not explored settlement discussions to resolve this writ case but are open to participating in a settlement conference with the Magistrate Judge."

However, the Court's order was for the parties to engage in private mediation.

The Torrance Airport Association ("TAA") is a small non-profit with extremely limited financial resources. We would like to jointly request the Court amend its order so that we can schedule a settlement conference before the magistrate judge; what are your thoughts?

Failing that, we will have to find a low cost mediation option. Again, your thoughts?

Thanks,
Chris

Torrance Airport Association (TAA) vs City of Torrance CV 24-2692-JFW (MRWx)

FW: Torrance/TAA - Settlement Conference/Mediation

From: Sagrario Lopez slopez@shabyandassociates.com

To: TorranceAirportAssociationZ11624221@shabyandassociates.filevineapp.com

Date: Mon Jun 09 2025 11:42:44 GMT+00:00

From: Yana Ridge

Sent: Monday, June 9, 2025 4:40 PM

To: Christopher Harshman

Cc: Mark Dillon ; Sue Toms ; Sagrario Lopez

Subject: RE: Torrance/TAA - Settlement Conference/Mediation

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Gatzke Dillon & Ballance LLP

LAWYERS

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--

R. Christopher Harshman, Esq.

David M. Shaby II & Associates, APC

11949 Jefferson Blvd. Ste 104

Culver City, CA 90230

(310) 827-7171 (main)

charshman@shabyandassociates.com

EXHIBIT 3

From: [Christopher Harshman](#)
To: [Yana Ridge](#)
Cc: TorranceAirportAssociationZ11624221@shabyandassociates.filevineapp.com; [Mark Dillon](#)
Subject: Re: Torrance/TAA - Settlement Conference/Mediation
Date: Thursday, June 26, 2025 2:07:05 PM

Yana,

Apologies, I have been out of the office with some sort of nasty viral infection, and am just now getting back up to speed.

In the future, as I believe we have requested in the past, if you do not receive a response to an email, please **call** my office to follow up; we will do the same.

I will prepare a request and file it this afternoon.

Thanks,
Chris

On Jun 10, 2025, at 11:58 AM, Yana Ridge <YRidge@gdandb.com> wrote:

Chris,

While we will not object to the TAA's request that the court amend its order, we note that you are raising this issue now, just days before the mediation deadline, even though on May 21 we asked to have a call to discuss the settlement/mediation logistics. After no response to that May 21 email, on June 2, 2025, we proposed to start with informal settlement discussions before we bring it to a mediator/judge, which would be the most cost effective, but your client has not presented a settlement demand yet. Regardless of whether this case goes through mediation or settlement conference with a magistrate judge, it would be productive to start with a settlement demand from TAA.

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FW: Torrance/TAA - Settlement Conference/Mediation

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To: TorranceAirportAssociationZ11624221@shabyandassociates.filevineapp.com

Date: Mon Jun 09 2025 11:42:44 GMT+00:00

From: Yana Ridge

Sent: Monday, June 9, 2025 4:40 PM

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Cc: Mark Dillon ; Sue Toms ; Sagrario Lopez

Subject: RE: Torrance/TAA - Settlement Conference/Mediation

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